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February 6, 1996

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BY HAND

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: Permissible Ex Parte Presentation in  
CC Docket No. 94-102 ✓

Dear Mr. Caton:

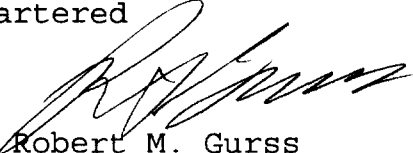
Pursuant to Section 1.1206 of the Commission's rules, this is to inform the Commission that the enclosed letter to Chairman Reed Hundt and the attached survey was delivered today. Copies were also delivered to each of the Commissioners and to the Commission staff identified on the letter. Two copies of the letter and survey are enclosed for filing in the above-referenced proceeding.

Please contact the undersigned if you have any questions.

Respectfully submitted,

WILKES, ARTIS, HEDRICK & LANE  
Chartered

By:

  
Robert M. Gurss

Attorneys for the Association of  
Public-Safety Communications  
Officials-International, Inc.

cc: All Commissioners  
Ms. Regina Keeney  
Ms. Michele Farquhar  
Ms. Kathleen Levitz  
Mr. Allan Thomas  
Mr. John Cimko

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February 6, 1996

The Honorable Reed Hundt  
Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

RE: Ex Parte Communication in CC Docket 94-102, Revision  
of the Commission's Rules to Ensure Compatibility  
with Enhanced 9-1-1 Emergency Calling Systems

Dear Mr. Chairman:

The Commission is currently considering a Notice of Proposed Rulemaking in the above-reference proceeding to adopt rules regarding the compatibility of Enhanced 9-1-1 systems with PBXs and wireless telephone services. The Association of Public-Safety Communications Officials-International, Inc. ("APCO") and the National Emergency Number Association ("NENA") recently conducted the attached survey which further demonstrates the need for immediate Commission action on these issues.

The survey, a copy of which is attached, asked managers of Public Safety Answering Points ("PSAPs") to indicate the extent to which their operations have been hindered by the inability to identify the exact location of callers from PBXs (or centrex systems) and cellular phones. Half of the respondents identified both of these situations to be "relatively major" or "major" problems, and the vast majority of respondents had experienced difficulty in locating PBX/centrex and cellular callers.

Many of the respondents also described specific instances where the safety of life and property had been endangered. For example, in Mesa, Arizona, a caller reported a shooting at a public school, but because of the call was from a school district-wide PBX, the Automatic Location Information ("ALI") on the call reflected the school district office, not the school where the shooting occurred. In Winter Park, Florida, calls reporting bank robberies are difficult to identify when

WILKES, ARTIS, HEDRICK & LANE

CHARTERED

The Honorable Reed Hundt  
February 6, 1996  
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all branches of the bank are on the same PBX, with the main office showing on the ALI. Other common problems involve single PBXs for large university campuses, hotels, hospitals, and mobile home parks.

Cellular calls to 9-1-1 create problems such as a delayed response to a Nashville area automobile accident where the call went to the wrong PSAP, a cellular call in Rochester, New York, regarding a kidnapping that turned into a homicide when the caller's location could not be identified, and the inability to find a woman calling 9-1-1 from her cellular phone after being kidnapped, raped, and abandoned on the roadside near Las Vegas.

These are just a handful of the serious problems that exist every day because public safety agencies cannot locate calls from PBXs and wireless telephones. APCO and NENA hope that this survey will provide further evidence of the need for Commission action on this critical public safety issue.

Please contact the undersigned should you have any questions. Two copies of this letter and the attached survey will be filed with the Secretary.

Respectfully submitted,

WILKES, ARTIS, HEDRICK & LANE,  
Chartered

By:

  
Robert M. Gurss

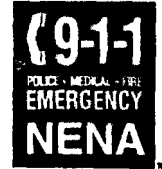
Attorneys for APCO

Attachment

cc: All Commissioners  
Ms. Regina Keeney  
Ms. Michele Farquhar  
Ms. Kathleen Levitz  
Mr. Allan Thomas  
Mr. John Cimko



## Summary Report Data Collected via Enhanced 9-1-1 PSAP Survey Regarding PBX & Centrex 9-1-1 Calls & Cellular & "PCS" 9-1-1 Calls.



**METHODOLOGY:** The attached survey was distributed via Broadcast Fax to 88 valid fax numbers of a sampling of small, medium and large 9-1-1 Public Safety Answering Points (PSAPs) over the January 12-14, 1996 weekend. A "return by date" of January 18, 1996 was requested. A "fax back return" was the only return option for the respondent(s).

Of the 88 surveys distributed, 35 were returned via fax, for a return rate of 39.8%. (Surveys from Colorado Springs, CO and St. Paul, MN were return too late to be included in statistical abstract attached but are reflected in aggregate totals)

The 35 respondents have the following aggregate attributes:

- *They represent 9-1-1 PSAPs serving an aggregate population of 19,360,716.*
- *They represent an annual 9-1-1 calls answered volume of 14,046,001.*
- *They represent a sampling of dense urban to suburban to semi-rural areas.*

The above 9-1-1 call to population ratio represents an average of 0.73 calls to 9-1-1 per person per year in the areas represented by the respondents. Applying this 0.73 calls per person per year to the total US population of 260,000,000 would mean an annual total of 9-1-1 calls in the USA of 189,800,000.

### ANALYSIS OF SURVEY RESPONSES:

Question 5a. Approximately what percent of your average daily 9-1-1 call volume comes from 9-1-1 calls from PBX phone systems?: ☒ Average: 4.5%

Preliminary conclusion: 4.5% of all 9-1-1 calls come from PBX systems. Therefore, among the respondent agencies, this would represent an average annual total of 604,662 PBX/9-1-1 calls. If extrapolated to the entire USA, the number would be 8,316,000 per year.

Question 5b. Approximately what percent of your average daily 9-1-1 call volume comes from 9-1-1 calls from Centrex/Centron systems? : ☒ Average: 5.39%

Preliminary conclusion: 5.39% of all 9-1-1 calls come from Centrex/Centron systems. Therefore, among the respondent agencies, this would represent an average annual total of 755,827 Centrex/9-1-1 calls per year. If extrapolated to the entire USA, the number would be 10,439,000 per year.


**☛ Therefore, between PBX and Centrex/Centron systems, it can be extrapolated that our respondents processed 1,360,489 9-1-1 calls per year. Extrapolated to the entire USA, that would equate to 18,755,000 calls to 9-1-1 from Multi Line Telephone Systems (MLTS) per year.**

Question 5c. Approximately what percent of your average daily 9-1-1 call volume comes from cellular or Personal Communications Systems (PCS) phones received directly at your PSAP (without having been transferred there from another agency)? ☒ Average: 7.4%

Preliminary conclusion: This 7.4% figure would represent an annual total of 1,071,900 cellular or PCS 9-1-1 calls being answered directly at the respondent PSAPs. If extrapolated to the entire USA, the estimated number of cellular calls answered directly at PSAPs such as the respondents (*no "Highway Patrol/State Police" dispatch centers were surveyed as they are rarely true 9-1-1 PSAPs, but they often are the initial answering agencies for cellular 9-1-1 calls*) would be 14,804,400.

Question 5d. Approximately what percent of your average daily 9-1-1 call volume comes from calls transferred to you which originated on cellular or PCS phones? ☒ Average: 3.39%

Preliminary conclusion: 480,981 9-1-1 calls are transferred to the respondent PSAPs each year. If that were extrapolated to the entire USA, that would mean 6,643,000 cellular or PCS calls to 9-1-1 transferred to these type of local PSAPs by another organization.

 *Therefore, between cellular and the emerging PCS phones, our respondent agencies reported answering an annual average of 1,552,881 calls directly & initially at their PSAPs. Extrapolated to the entire USA, that would equate to 21,458,700 such calls answered directly at or transferred to local 9-1-1 PSAPs, not counting a perhaps larger number that are initially and directly answered by Highway Patrol(s) in the various states.*

Question 6: Rate the severity of problems you encounter in handling 9-1-1 calls from PBX/Centrex systems. (The possible responses are below and the points awarded to each are indicated):

- \_\_\_ Not a real problem. 1 Point
- \_\_\_ Somewhat of a problem. 2 points
- \_\_\_ A relatively major problem. 3 points
- \_\_\_ A major problem. 4 points

*The average number of points accumulated for the respondents was 2.58, or somewhere between "Somewhat of a problem" and "A relatively major problem".*

*6 of the 33 respondents said it was a "major problem" (18.2%), while 10 of the respondents indicated it was "A relatively major problem" (30.3%).*

*The combined number of respondents who ranked this as a "Relatively Major" and a "Major" problem was 16, or 48.5%.*

Question 7: Rate the severity of problems you encounter in handling 9-1-1 calls from cell or PCS phones. (The possible responses are below and the points awarded to each are indicated):

- \_\_\_ Not a real problem. 1 Point
- \_\_\_ Somewhat of a problem. 2 points
- \_\_\_ A relatively major problem. 3 points
- \_\_\_ A major problem. 4 points

*The average number of pointed accumulated for the respondents was 2.64 out of a possible 4.0, or somewhere between "Somewhat of a problem" and "A Relatively Major Problem". A total of 17 respondents called this a "Relatively Major Problem" or "A Major Problem" or 51.5% of all respondents.*

Question 8: This question had 10 statements (below) which respondents could check if they apply in their PSAPs.

*"Place a check mark by all the potential 9-1-1/PBX or Centrex problems your PSAP has actually encountered in approximately the past six months."*

\_\_\_ Callers have not known the address of where they were calling 9-1-1 from and the PBX/Centrex ALI address was different from the address they were actually at.

☒ 25 of 33 checked this box, or 76%

\_\_\_ Lack of info on precise location of the caller has led to delays in emergency responses.

☒ 24 of 33 checked this box, or 73%

\_\_\_ Callers have not been able to speak or speak clearly enough to provide the call taker with clarifying or additional location information.

☒ 17 of 33 checked this box, or 52%

\_\_\_ Call takers forgot or didn't have time to verify actual address as opposed to PBX or Centrex ALI address.

☒ 17 of 33 checked this box, or 52%

\_\_\_ PBX 9-1-1 "hang-up" calls have created problems for us.

☒ 25 of 33 checked this box, 76%

\_\_\_ Fax machines connected to PBX systems have mistakenly dialed 9-1-1 and sometimes continued to do so and we couldn't ID which fax it was within the PBX organization.

☒ 16 of 33 checked this box, or 49%

\_\_\_ Some 9-1-1 calls from PBX or Centrex systems have not been selectively routed to the PSAP they should have gone to.

☒ 16 of 33 checked this box, or 49%

\_\_\_ Centrex stations have been moved or reassigned within the Centrex user's organization and the ALI database was not updated.

☒ 14 of 33 checked this box, or 42%

\_\_\_ Parties needing emergency help couldn't dial 9-1-1 because their PBX or Centrex system had the ability to dial 9-1-1 disabled.

☒ 9 of 33 checked this box, or 27%. (Many wrote in that they would not necessarily know this because they would not have gotten the call or the caller, when the event was eventually reported, did not report this fact)

\_\_\_ We got 9-1-1 calls from a PBX or Centrex reporting emergencies that were not internal to the PBX or Centrex user facility but were outside, next door, at employee's home, etc.

☒ 22 of 33 checked this box, or 67%

Question 10: Place a check mark by all of the potential cellular/PCS 9-1-1 problems your PSAP has actually encountered in approximately the past six months.

\_\_\_ Too many calls received, overwhelming the call takers, all reporting the same event.

☒ 20 of 33 checked this box, or 61%

\_\_\_ Inability to receive caller ANI and place callbacks hampered operations.

☒ 23 of 33 checked this box, or 70%

\_\_\_ Received calls from far outside our jurisdiction and we didn't know whom to transfer them to.

☒ 15 of 33 checked this box, or 46%

\_\_\_ Other cell/9-1-1 answering agency got the initial calls and didn't transfer caller to us and all we got was second hand info and responses were hampered.

☒ 24 of 33 checked this box, or 73%

\_\_\_ Callers with emergencies didn't know their locations and we had trouble generating a response to the problem location.

☒ 20 of 33 checked this box, or 61%

\_\_\_ Callers with "moving emergencies" presented problems because they needed to be transferred to the radio dispatcher for coordination.

☒ 9 of 33 checked this box, or 27%

\_\_\_ We got lots of calls from expressways (which we don't handle) and we have to transfer them elsewhere.

☒ 8 of 33 checked this box, or 24%

\_\_\_ Another cell/9-1-1 answering agency gets all of our local cell 9-1-1 calls about events they don't handle and they have to figure out which local to transfer the call to.

☒ 11 of 33 checked this box, or 33%

**FREE FORM COMMENTS:** Respondents were also given the opportunity to provide free form comments relating to specific PBX/Centrex or cell/PCS 9-1-1 problems they have encountered at their PSAPs in the recent past. Those comments are reflected on the attached stat sheet.

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Extract of Extra Detail Provided Re <sup>PBX</sup>~~CELL~~/911 Calls

AGENCY RESPONDING	CONTACT NAME	PHONE #	PBX CALL DETAIL
WINTER PARK, FL	LT. CRAMPTON	407-623-3460	BARNETT BANK, 250 S. PARK AV IS MAIN OFC FOR ALL BRANCHES IN ORANGE COUNTY. ALL 911 CALLS FROM ALL THE BRANCHES COME TO OUR PSAP. WE GET 911 CALLS REPORTING BANK ROBBERIES THROUGHOUT THE COUNTY. CREATES DELAY GETTING UNITS TO SCENE WHEN TIME CRITICAL
MESA, AZ POLICE	JOE NOCE	602-644-2283	REC'D PBX CALL FROM PUB SCHOOL RE: SHOOTING. CLR NOT CLEAR ON EXACT LOC, PD/FD UNITS DISPATCHED BUT SENT TO LOC SHOWN ON PBX ALI. SHOOTING ACTUALLY OCCURRED @ A SCHOOL 3 MILES AWAY. THIS CAUSED A DELAY FOR BOTH PD AND FD UNITS
PORTLAND, OR	PAUL STEIN	503-823-0911	NONE PROVIDED
MILWAUKEE, WI	JAMES PROULX	414-935-7472	REPETITIVE PRANK CALLS (MOSTLY FROM SCHOOLS) CANNOT BE TRACED QUICKLY TO THE SOURCE. ALSO, WHEN WE CALL BACK PBX ALI #'s THEY USUALLY DO NOT REVEAL SOURCE OF THE CALL OR IF ANSW. BY A PERSON, THEY HAVE NO KNOWLEDGE OF CLUE CONCERNING CALL IN QUESTION
TUCSON, AZ	LEN JOHNSON	520-791-3111	IT IS A FACT THAT THE LACK OF INFO OR INCORRECT INFO CAUSES SERIOUS PROBLEMS FOR 911 DISPATCHERS TRYING TO SEND HELP. IT ALSO AFFECTS SUBSEQUENT CALLS REC'D AS



DISPATCHER MUST TAKE MORE TIME  
ON PBX CALL TO GET LOC INFO,  
THUS DELAYING BOTH CALLS.

Extract of Extra Detail Provided Re <sup>PBX</sup>~~CELL~~/911 Calls

AGENCY RESPONDING	CONTACT NAME	PHONE #	PBX CALL DETAIL
OKLAHOMA CITY, OK	LT. SCOTT MCCALL	405-297-2250	NONE PROVIDED
DANE CO, WI (MADISON)	DUKE ELLINGSON	608-267-3912	NOT ALL TELCOS PASS "PBX" OR "CNTX" AS A CLASS OF SERVICE ON ALI RECORDS
SEATTLE, WA	RANDY TIBBS	206-684-8632	WE, LIKE OTHERS, MUST ADJUST TO THE TECHNOLOGY.
DUPAGE COUNTY (IL)	RICHARD TUMA	708-260-7500	MAJOR PROBS W/LARGE WHSES SINCE EXACT LOC CAN'T BE DETERMINED FROM PBX ALI. ALSO, SCHOOL CALLED BOMB THREAT AND FD WAS SENT TO SCHOOL ADMIN BLDG SINCE PBX ALI SHOWED THAT ADDRESS NOT THE ACTUAL LOC OF THREAT IN DIFFERENT TOWN. (LOMBARD, IL, FALL '95)
DAVIDSON CO TN-NASHVILLE	ALLEN MUSE	615-862-8554	WHEN YOU COMBINE "9" OUT CODE ON PBX W/SOME VOICE MAIL PASSWORDS WE GET FALSE 911 CALLS. HAVEN'T TRACKED THE PBX 911 PROB. CAREFULLY OVER TIME, BUT THE PROBLEM IS GROWING.
DEKALB CO, GA (ATLANTA)	BARRY WOODWARD	404-294-2858	NONE PROVIDED
BEECH GROVE, IN	WILLIAM TEMPLIN	317-782-4949	911 CALLS FROM AMTRAK TRAIN OFFICE DOWNTOWN SHOW THE BEECH GROVE BILLING OFFICE LOCATION AND GET ROUTED HERE INSTEAD OF INDIANAPOLIS WHERE THEY SHOULD BE ROUTED.
FAIRFAX COUNTY, VA	MICHAEL FISCHER	703-280-0527	GE RESCOM PROVIDES RESIDENTIAL PBX SVC. SUPPLEMENTAL 911

NOTIFICATION PROVIDED BY A 3RD  
PARTY HAS CREATED ONGOING  
ADDRESS, LOCATION AND RESPONSE  
DELAY PROBLEMS.

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Extract of Extra Detail Provided Re <sup>PBX</sup>~~CELL~~/911 Calls

AGENCY RESPONDING	CONTACT NAME	PHONE #	PBX CALL DETAIL
MONTGOMERY CO, MD	JOHN CRABILL	301-217-4656	NONE PROVIDED
APOPKA, FL	DEBORAH CARUTHERS	407-889-1757	KNIGHT'S INN MOTEL (228 W. MAIN ST, APOPKA) ACTUAL HEART ATTACK CALL, COULDN'T DETERMINE FROM PBX ALI EXCAT LOC IN MOTEL. WHOLE MOTEL HAD TO BE SEARCHED TO FIND HEART ATTACK VICTIM. EXACT DATE/TIME UNK. FOR THIS SURVEY.
ROCHESTER, NY	JOHN PAGANO	716-528-2200	MAJOR CORP. W/ SEVERAL SITES DOESN'T ALLOW 911 ACCESS FROM PBX SETS, MUST DIAL 7 DIGIT#. MAJOR UNIVERSITY COMPLEX GENERATES ONE "GENERIC" ADDRESS FOR ALL BUILDINGS & HOSPITAL EVEN THOUGH THEY COVER SEVERAL SQUARE MILE AREA.
LAS VEGAS, NV	SHARON COUNTERMAN	702-229-3880	NONE DOCUMENTED, SORRY.
BALTIMORE, MD FIRE	DENIS MCMAHON	410-396-5682	NONE PROVIDED
HILLSBOROUGH CO FL-TAMPA	B.J. SMITH	813-744-5911	PBX VENDORS ARE TRYING TO SELL CHEAP PBX'S TO MOBILE HOME PARKS WITH THE ATTENDANT PBX/911 PROBLEMS. MOBILE HOME PARKS ARE EXTENSIVE AND LARGE IN FLORIDA, PRIMARILY OCCUPIED BY THE ELDERLY (MORE MEDICAL EMERGENCIES)
MARION CO, IN-INDIANAPOLIS	GARRY WEGNER	317-327-3707	PBX STATIONS IN LOCAL HOSPITAL COULD NOT DIAL 911 DURING PROBLEM THERE.

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Extract of Extra Detail Provided Re <sup>PBX</sup>~~CELL~~/911 Calls

AGENCY RESPONDING	CONTACT NAME	PHONE #	PBX CALL DETAIL
LOS ANGELES, CA (CITY)	WANDA WILLIAMS	213-485-4455	NONE PROVIDED. ** note: May not have understood this question as respondent stated that PBX/CNTX issues were "Not applicable" to LAPD??
OMAHA, NE	MARK CONREY	402-444-5800	NONE PROVIDED
HAMILTON CO, OH (CINCY)	RONALD BREN	513-595-8448	LARGE COMPANIES AND ORGANIZATIONS SUCH AS HOSPITALS THAT HAVE A LARGE NUMBER OF PHONES LEAD TO PROBLEMS IN DETERMINING THE EXACT LOCATION OF THE EMERGENCY INCIDENT.
HENNEPIN CO, MN:TC METRO	BRUCE LENNOX	612-525-6250	NONE PROVIDED
NW CENTRAL, (MET CHICAGO)	DOUG EDMONDS	847-398-1130	TIME FRAME TOO SHORT TO RESEARCH THIS AND PULL THE INFO TOGETHER.
BERGEN CO, NJ (NYC METRO)	PAUL EINREINHOFER	201-599-6210	MANY CALLS FROM PBX TO 911 WHERE CALLER INTENDED TO CALL AN OUTSIDE LINE AND THEN TO ANOTHER COUNTY (9 FOR OUTSIDE + 11 *IT SHOULD BE 011*. WE HAVE TO ASSIGN OFFICERS TO VERIFY THAT THE CALL ISN'T EMERGENCY ONCE THEY HANG UP AND WE CAN'T CALL BACK.
ORLANDO, FL	MARILYN WARD	407-246-2446	BANKS, HOSPITALS, OFFICES AND COLLEGES CAUSE MAJOR PBX & CENTREX PROBLEMS. WE DON'T KEEP RECORDS ON THESE OCCURRENCES. THEY HAPPEN DAILY

AND IT WOULD TAKE AN EXTRA  
STAFF PERSON PER SHIFT TO KEEP  
THESE RECORDS!

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Extract of Extra Detail Provided Re <sup>PBX</sup>~~CELL~~/911 Calls

AGENCY RESPONDING	CONTACT NAME	PHONE #	PBX CALL DETAIL
MAITLAND, FL	COMM COMMANDER	407-539-6262	DURING PAST MONTH, 2 PBX CALLERS WERE DISCONNECTED DURING TRANSFERS TO ORANGE CO FIRE-AND SINCE THERE WAS NO VALID ANI CALLBACK # THE CALLERS COULD NOT BE CALLED BACK TO RE-ESTABLISH COMMUNICATIONS.
ORLANDO, FL AIRPORT	PATTY BOATMAN	407-825-2065	CAR RENTAL COMPANIES HAVE 4-5 LOCATIONS WHERE THE INCIDENT COULD BE OCCURRING. EMPLOYEES HAVE NOT KNOWN EXACT ADDRESS. PBX ALI SHOWED ONE OF THEM. ABT 1/1/96, GOT 2 911 CALLS FROM AN AIRPORT BUSN THAT WAS CLOSED, TURNED OUT # WAS REASSIGNED TO RESD.
ORLANDO, FL FIRE	LAURA MIHOLIES	407-246-2134	NONE PROVIDED
KING COUNTY, WA	JIM BOWMAN	206-296-7508	RESIDENTIAL PBX CALL, CALLER DIALS 911 DURING A DOMESTIC VIOLENCE ATTACK AND LAYS PHONE DOWN WITHOUT SPEAKING. BAD PBX ALI IMPEDED DFINDING HER.
MINNEAPOLIS, MN	SUSANNE GRIFFIN	312-348-7208	MANY PBX CALLS FROM MPLS PUB SCHOOLS WHERE ONLY ALI IS THEIR MAIN OFC, MANY PROBS - MANY CALLS FROM BUSN FAXES THAT CAN'T BE TRACKED DOWN, SOME FIRE CALLS FROM PBX WHERE RESPONSE IS SENT TO MAIN PBX ADDRESS BUT FIRE IS ELSEWHERE, BANK PROBLEMS TOO.

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Extract of Extra Detail Provided Re <sup>PBX</sup>~~CALL~~/911 Calls

AGENCY RESPONDING	CONTACT NAME	PHONE #	PBX CALL DETAIL
BUFFALO, NY	EDWARD PRABUCKI	716-851-4549	NONE PROVIDED
COLORADO SPRINGS, CO	PATRICIA REED	719-444-7771	One of the most notable PBX calls was a bank robbery where the PBX was located in a branch several miles away from the branch where the robbery occurred. The several minute delay in responding was because caller didn't know branch address of robbery.
ST. PAUL, MN	LT. RICHARD DUGGAN	612-292-3567	Large complexes without human staff to question represent our only real PBX or Centrex 911 problems.



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Extract of Extra Detail Provided Re CELL 911 Calls

AGENCY RESPONDING	CONTACT NAME	PHONE #	
WINTER PARK, FL	LT. CRAMPTON	407-623-3460	PROB. W/ HAVING CELL CALLS TRANSFERRED TO OUR AGENCY THAT ARE NOT IN OUR JURISDICTION. ALSO HAVING PROBS W/ CELL USERS NOT KNOWING THEIR LOCATION.
MESA, AZ POLICE	JOE NOCE	602-644-2283	MANY CELL CALLERS ARE JUST PASSING THROUGH OUR JURISDICTION AND ARE UNFAMILIAR WITH THE AREA. WERY DIFFICULT TO GET GOOD LOCATIONS FOR UNITS TO RESPOND TO WHETHER CALLER IS MOBILE OR STATIONARY.
PORTLAND, OR	PAUL STEIN	503-823-0911	NONE PROVIDED
MILWAUKEE, WI	JAMES PROULX	414-935-7472	MOBILE CELL USER OBSERVED BANK ROBBERY SUSPECTS AND FOLLOWED THEM TO PROVIDE LOC UPDATES. INCIDENT MOVED THRU 3 JURISDICTIONS CREATING CONFUSION ABOUT ULTIMATE LOCATION WHERE RESPONSE WAS NEEDED.
TUCSON, AZ	LEN JOHNSON	520-791-3111	THERE IS NO DOUBT THE LACK OF ADEQUATE LOCATION OF PBX AND CELL 911 CALLS CAUSES UNNECESSARY PROBLEMS. CELL PHONES HAVE INCREASED OUR CALL LOADS BUT HAVE SET THE SYSTEM BACK TO PRE-ENHANCED 911 DAYS, IN OUR CASE, BACK 11 YEARS.

Extract of Extra Detail Provided Re CELL/911 Calls

AGENCY RESPONDING	CONTACT NAME	PHONE #	
OKLAHOMA CITY, OK	LT. SCOTT MCCALL	405-297-2250	NONE PROVIDED
DANE CO, WI (MADISON)	DUKE ELLINGSON	608-267-3912	NONE PROVIDED
SEATTLE, WA	RANDY TIBBS	206-684-8632	WE, OF COURSE, GET MORE MULTIPLE/DUPLICATE CALLS ON SERIOUS INCIDENTS BECAUSE OF THE WIDESPREAD USE OF CELL PHONES. IN OUR COUNTY 911 CELL CALLS ARE ROUTED BASED ON THE LOCATION/DIR. OF CELL SITE SECTOR, WE ALSO GET ANI PER STATE LEGISLATION.
DUPAGE COUNTY (IL)	RICHARD TUMA	708-260-7500	CLRS GET FRUSTRATED BEING X-FER'D TO MULTIPLE PSAPS. CLR RPTD ACC. AND GAVE WRONG TOWN. ADDRESS RPTD APPEARS IN 2 TOWNS, ONE OF WHOM WE DON'T DISP. FOR. SUBSTANTIAL DELAY IN RESP. LIFE LOSS POTENTIAL GREAT. 12/13/95 @ 1408, NAPERVILLE, IL.
DAVIDSON CO TN-NASHVILLE	ALLEN MUSE	615-862-8554	8/95 FATAL CAR ACC. RURAL AREA CELL 911 CALL WENT TO ADJACENT CO. PSAP CALL RELAYED TO US AFTER 20 MINS. OUR EMS RESP TIME WAS 35 MIN, POLICE 45 MINS, DIDN'T KNOW WHAT HAPPENED FOR 30 DAYS UNTIL COMPLAINT FILED, RESP SHOULD HAVE BEEN 6-9 MINS.
DEKALB CO, GA (ATLANTA)	BARRY WOODWARD	404-294-2858	NONE PROVIDED

Extract of Extra Detail Provided Re CELL 911 Calls

AGENCY RESPONDING	CONTACT NAME	PHONE #	
BEECH GROVE, IN	WILLIAM TEMPLIN	317-782-4949	NONE PROVIDED
FAIRFAX COUNTY, VA	MICHAEL FISCHER	703-280-0527	DURING RECENT TANKER TRUCK ACCIDENT, CELL CALLS FROM MOTIRISTS STANDING STILL ON FREEWAY IMPEDED ANSWERING OF OTHER VALID EMERGENCY CALLS.
MONTGOMERY CO, MD	JOHN CRABILL	301-217-4656	NONE PROVIDED
APOPKA, FL	DEBORAH CARUTHERS	407-889-1757	WE RECEIVE NUMEROUS CALLS FROM CALLERS WHO HAVE NO IDEA OF THEIR LOCATION. SOME ARE NOT EVEN CLOSE TO OUR JURISDICTION!
ROCHESTER, NY	JOHN PAGANO	716-528-2200	ONE ADVANTAGE WE HAVE IS THAT CELL PROVIDERS SEND ANI WITH 911 CALLS. EXAMPLE: HOMICIDE W/WOMAN KIDNAPPED, DIALED 911 ON CELL, WE HEARD ENTIRE EVENT BUT COULDN'T LOCATE THE CALLER UNTIL IT WAS TOO LATE.
LAS VEGAS, NV	SHARON COUNTERMAN	702-229-3880	CELL CALL FROM FEMALE KIDNAPPED AND DUMPED IN DESERT AFTER BEING RAPED AND NOT KNOWING WHERE SHE WAS (NO CELL ALI TO HELP). OUR CHOPPER WAS FINALLY ABLE TO FIND HER. GOOD THING IT WAS DAYLIGHT.
BALTIMORE, MD FIRE	DENIS MCMAHON	410-396-5682	NONE PROVIDED
HILLSBOROUGH CO FL-TAMPA	B.J. SMITH	813-744-5911	LCAK OF DEDICATED OR PRIORITY ACCESS FROM CELL SITE TO CELL SWITCH AND CELL SWITCH TO 911

SWITCH. THIS CREATES BUSY  
CONDITIONS FORM 911 CALLERS IN  
EMERGENCIES. MANY DON'T KNOW  
THEIR OWN CELL # AND ARE NOT  
AWARE CELL 911 CALLS ARE FREE.

Extract of Extra Detail Provided Re CELL/911 Calls

AGENCY RESPONDING	CONTACT NAME	PHONE #	
MARION CO, IN-INDIANAPOLIS	GARRY WEGNER	317-327-3707	NONE PROVIDED
LOS ANGELES, CA (CITY)	WANDA WILLIAMS	213-485-4455	CALIF HWY PATROL RECEIVES ALL 911 CELL CALLS DIRECT, WHICH IS NOT A PROBLEM UNLESS CHP HAS DELAYS IN FINDING OUT THE CALL IS IN LAPD'S JURISDICTION.
OMAHA, NE	MARK CONREY	402-444-5800	NONE PROVIDED
HAMILTON CO, OH (CINCY)	RONALD BREN	513-595-8448	A LOCAL COMPANY THAT OFFERS SMR WITH PHONE PATCH IN OUR AREA ROUTES ALL 911 CALLS TO US, SHOWING THE SMR PROVIDER'S BUSINESS ADDRESS ONLY.
HENNEPIN CO, MN:TC METRO	BRUCE LENNOX	612-525-6250	NONE PROVIDED
NW CENTRAL, (MET CHICAGO)	DOUG EDMONDS	847-398-1130	NOTE THAT WE REFUSE TO ACCEPT CELL OR PCS CALLS DUE TO THE INHERENT LACK OF ALI INFO, ADDED CALL HANDLING TIME, EXPECTED HIGH CALL VOLUME AND LACK OF FUNDING SOURCE FOR THIS SERVICE.
BERGEN CO, NJ (NYC METRO)	PAUL EINREINHOFFER	201-599-6210	PROBLEM W/ STOLEN CELL PHONES DIALING 911. WE HAD A FALSE CALL OF A SHOOTING IN PROGRESS FROM A CELL. DISPATCHED PARAMUS NJ OFFICER. HE WAS KILLED IN A CAR ACCIDENT DURING THE RESPONSE TO THIS FALSE CALL. (LETTER ATTACHED-WOULD MAKE GOOD WITNESS @ FCC

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Extract of Extra Detail Provided Re CELL 911 Calls

AGENCY RESPONDING	CONTACT NAME	PHONE #	
ORLANDO, FL	MARILYN WARD	407-246-2446	NOT HAVING ANI OR ALI INFO IMPEDES OUR RESPONSES TO EMERGENCY CALLS.
MAITLAND, FL	COMM COMMANDER	407-539-6262	MANY PROBLEMS
ORLANDO, FL AIRPORT	PATTY BOATMAN	407-825-2065	NONE PROVIDED
ORLANDO, FL FIRE	LAURA MIHOLIES	407-246-2134	NONE PROVIDED
KING COUNTY, WA	JIM BOWMAN	206-296-7508	NONE PROVIDED. (THEY HAVE ANI AND PARTIAL ALI IN SEATTLE AREA)
MINNEAPOLIS, MN	SUSANNE GRIFFIN	312-348-7208	NONE PROVIDED
BUFFALO, NY	EDWARD PRABUCKI	716-851-4549	NONE PROVIDED
COLORADO SPRINGS, CO	PATRICIA REED	719-444-7771	
ST. PAUL, MN	LT. RICHARD DUGGAN	612-292-3567	None provided



**ATTENTION: MAJOR E9-1-1 PSAPs**  
**Information urgently needed on PBX/Centrex**  
**and Cellular/PCS 9-1-1 Call Problems.**  
**FAX REPLY REQUIRED BY 1/18/96**



As you are likely aware, your national NENA and APCO organizations have been very actively working towards the publication by the Federal Communications Commission of a new set of mandatory rules which would require the implementation of a series of solutions to our profession's well known Cellular 9-1-1 and PBX/Centrex 9-1-1 problems.

We made major progress when, in October, 1994, the FCC issued their proposed rule making document under FCC Docket # 94-102. In general, this was a very good initial presentation of their intent to take dramatic steps to respond to this problem. We and other public safety organizations submitted strongly supportive comments in early 1995. All of us were expecting the FCC to issue their final rule or rules on these issues before the end of 1995. It was expected that the rule(s) would place rather stringent requirements on the manufacturers and system operators of these telecommunications systems to bring their systems into better compliance with the needs of the Enhanced 9-1-1 community and the public.

We have now learned that two or three factors are threatening to significantly delay and, perhaps, threaten the very issuance of these rules (more likely the PBX/Centrex portion of the rule) in an FCC "Report and Order" document. The first two are obvious, the "budget stalemate" which shut the FCC down for several weeks (and may well do so again) and the recent shutdowns due to the massive snowstorms in the East. The third is a recent volley of pressure being applied on the Commission by those for profit organizations who would rather not have these rules or any effective rules in place. In general, they are bemoaning the costs they might have to incur to modify their systems for compliance with any rules. They also don't want state legislatures or regulatory bodies to impose any rules that would have a cost impact on them. One of the most often heard statements from these groups is this: *"These PBX/9-1-1 issues are minor problems, if problems at all. We are just not aware of a significant occurrence of these alleged 9-1-1 problems in our systems to justify the 'massive' expense and disruption to our businesses"*. We all know these problems are out there, but due to the decentralized nature of 9-1-1 in the USA, with most PSAPs being operated relatively independently by individual cities and counties, we have not had an effective and on-going effort to collect the very data and information we need to counteract these statements. Our continual reliance on a few "celebrated" cases and depictions of "theoretical situations" seems to have become inadequate.

*Simply put, we need a large number of real and timely facts and occurrences to head off this potential threat to our progress.*

We need you to act immediately to collect the data called for on the attached survey and return it via fax by January 18, 1996 (That's NEXT THURSDAY). Please don't miss out on this opportunity to help your professional associations have an impact on your operations in a real and meaningful way. Thank you.

*Ronnie Rand / per*

Ronnie Rand  
Executive Director, APCO International

*Bill Stanton / per*

Bill Stanton  
NENA Executive Director



## MAJOR E9-1-1 PSAP SURVEY REGARDING PROBLEM PBX/CENTREX & CELLULAR/PCS 9-1-1 CALLS



**INSTRUCTIONS:** Please answer the following questions as completely as possible and return via fax to 612-623-0944 not later than January 18, 1996. TIME IS OF THE ESSENCE. The data collected will be used to attempt to influence the FCC to expedite their issuance of their long promised rule regarding needed E9-1-1 improvements to PBX and wireless 9-1-1 interfaces. You are urged to circulate the survey to your working shifts to get as much important line input as possible.

1. Responding E9-1-1 jurisdiction: \_\_\_\_\_
2. Responding person name: \_\_\_\_\_ Title: \_\_\_\_\_
3. Responding person Voice Tel. #: \_\_\_\_\_ Fax #: \_\_\_\_\_
4. Approximate annual E9-1-1 call volume: \_\_\_\_\_ Population served: \_\_\_\_\_
5. Approximately what percent of your average daily 9-1-1 call volume is:
  - 5a. \_\_\_\_\_ Calls from PBX systems?
  - 5b. \_\_\_\_\_ Calls from Centrex/Centron systems?
  - 5c. \_\_\_\_\_ Calls received ***directly*** from cell phones or PCS phones?
  - 5d. \_\_\_\_\_ Calls transferred to you which originated on cell or PCS phones?
6. Rate the severity of problems you encounter in handling 9-1-1 calls from PBX/Centrex systems:  
☐ Not a real problem; ☐ Somewhat of a problem; ☐ A relatively major problem; ☐ A major problem
7. Rate the severity of problems you encounter in handling 9-1-1 calls from cell or PCS phones:  
☐ Not a real problem; ☐ Somewhat of a problem; ☐ A relatively major problem; ☐ A major problem
8. Place a check mark by all of the potential 9-1-1/PBX or Centrex problems your PSAP has actually encountered ***in approximately the past six months:***
  - ☐ Callers have not known the address of where they are calling from and the PBX/Centrex ALI address was different from the address they were actually at.
  - ☐ Lack of info precise location of the caller, has led to delays in emergency responses.
  - ☐ Callers have not been able to speak or speak clearly enough to provide the call taker with clarifying or additional location information.
  - ☐ Call takers forgot to or didn't have time to verify actual address as opposed to PBX or Centrex ALI address.
  - ☐ PBX 9-1-1 "hang up calls" have created problems for us.
  - ☐ Fax machines connected to PBX systems have mistakenly dialed 9-1-1 and sometimes continued to do so and we couldn't ID which Fax it was within the PBX organization.
  - ☐ Some 9-1-1 calls from PBX or Centrex systems have not been selectively routed to the PSAP they should have gone to.
  - ☐ Centrex stations have been moved or reassigned within the Centrex user's organization and the ALI database was not updated.
  - ☐ Parties needing emergency help couldn't dial 9-1-1 because their PBX or CENTREX system had the ability to dial 9-1-1 disabled.
  - ☐ We got 9-1-1 calls from a PBX or Centrex reporting emergencies that were not internal to the PBX or Centrex user facility but were outside, next door, at employee's home etc.

Turn over for page 2



☐ *Other problems (describe):*

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9. Please provide substantial detail on one or more of the PBX or Centrex 9-1-1 problems you described in Question 8 from above; Include dates, times, names, locations, etc. if they are available and releasable. Attach additional sheets if needed.

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10. Place a check mark by all of the potential cellular/PCS 9-1-1 problems your PSAP has actually encountered **in approximately the past six months:**

- ☐ *Too many calls received, overwhelming the call takers, all reporting the same event.*
- ☐ *Inability to receive caller ANI and place callbacks has hampered operations.*
- ☐ *Received calls from far outside our jurisdiction and we didn't know who to Xfer to.*
- ☐ *Other cell/9-1-1 answering agency got the initial calls and didn't transfer caller to us, all we got was second hand info and responses were hampered.*
- ☐ *Callers with emergencies didn't know their locations and we had trouble generating a response to the problem location.*
- ☐ *Callers with "moving emergencies" presented problems because they presented a problem in determining where to send responders.*
- ☐ *Callers with "moving emergencies" taxed our system because they needed to be X'fered to the radio dispatcher for coordination.*
- ☐ *We got lots of calls from expressways (which we don't handle) and we have to transfer them elsewhere.*
- ☐ *Another cell/9-1-1 answering agency gets all of our local cell 9-1-1 calls about events they don't handle and they have to figure out which local to Xfer the call to.*
- ☐ *Other problems (describe):*

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11. Please provide substantial detail on one or more of the cell/PCS 9-1-1 problems you described in Question 9 from above; Include dates, times, names, locations, etc. if they are available and releasable. Attach additional sheets if needed.

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***Thanks for assisting your profession in influencing this important public policy issue. Survey results will be available after January 19, 1996. If you want a copy of the tabulation, contact NENA or APCO HQ. The results will be published in the APCO Bulletin and the NENA News.***